

# EPSTEIN ARLEN & OSTROVE, LLC

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**VIA ECF and**

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The Honorable Andrew L. Carter, Jr.

United States District Court

Southern District of New York

40 Foley Square, Room 435

New York, New York 10007

Re: *Gansett One, LLC v. Husch Blackwell, LLP*  
Civil Action No. 15-cv-3551 (ALC) (GWG)

Dear Judge Carter:

We represent Plaintiffs in connection with the above-referenced matter.

Currently pending before the Court is Defendants' Motion to Dismiss. Under the current briefing schedule set by the Court, Plaintiffs' opposition is due on September 21, 2015 and Defendants' reply is due on October 5, 2015. When the schedule was set originally, we did not fully appreciate when the Fall Jewish Holidays were going to fall out. At this time, we are respectfully requesting additional time.

In light of the above, we write to respectfully request a two week extension on all upcoming dates. We have conferred with counsel for Defendants and they have consented to this request. As such, we respectfully request that the due date for Plaintiffs' opposition be extended to October 5, 2015 and the due date for Defendants' reply be extended to October 19, 2015.

We note that under the original schedule, the Court would have had the motion papers for approximately three weeks prior to the telephone status conference scheduled for October 26, 2015. Under this new proposed schedule, the Court will only have the papers for one week. If the Court deems additional time necessary, the parties consent to an adjournment of the telephone status conference for that additional time.

Finally, we note that the parties continue to be in agreement that discovery is stayed pending further order of the Court.

Respectfully submitted,  
EPSTEIN, ARLEN & OSTROVE, LLC

By: 

ELLIOT D. OSTROVE

cc: All Counsel of Record (via ECF)